

February 6, 2006

VIA ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
The Portals
445 12th Street, SW
Washington, DC 20554

Re: Volo Communications, Inc., Certification of CPNI Filing (2-6-06)
EB Docket No. 06-36, EB-06-TC-060

Dear Ms. Dortch:

Pursuant to the Public Notice issued by the Enforcement Bureau on January 30, 2006¹ and the Commission rules concerning telecommunications carriers protection of the privacy of customer proprietary network information (“CPNI”),² Volo Communications Inc., on behalf of itself and all of its subsidiaries (“Volo” or the “Company”) submits this Compliance Statement and Certificate. The Company is a wholesale carrier’s carrier and also provides telecommunications services to Voice over IP providers. It therefore has knowledge of end user CPNI only insofar as it has call completion information that it uses to bill its carrier and VoIP customers – it does not have any CPNI information that would allow it to know the identity or any other personally identifiable information about the person making the calls it carries. Volo recognizes that protecting this CPNI, and the CPNI of our carrier customers, is an important obligation for all telecommunications carriers and the Company has put into practice various operational procedures designed to protect the privacy of its customers CPNI.

Volo further is cognizant of the media reports regarding release of subscriber information to so called “data-brokers” and assures the Commission that it protects its Customers’ confidential information and does not and will not allow it to be released to unrelated third parties for any reason. The Company has implemented extensive operational procedures to protect the confidentiality of such information. Nonetheless, in light of the media reports, Volo is concurrently reviewing those procedures and implementing a more comprehensive plan for protecting its customers’ confidential information including an expansion of its protections against inadvertent external release and to assure complete compliance as to its own internal uses of the information. As part of this comprehensive plan, Volo will issue updated notices to its customers providing them additional opportunities to grant or deny Volo approval to use their CPNI.

As requested by the Public Notice, the undersigned, as an officer of Volo, certifies based upon personal knowledge that the following Compliance Statement accurately describes the operational procedures and policies implemented by Volo to ensure the privacy of its customers’ CPNI consistent with Commission’s CPNI rules.

¹ *Enforcement Bureau Directs All Telecommunications Carriers to Submit CPNI Compliance Certifications*, WC Docket No. 05-196, Public Notice, DA 06-223 (rel. Jan. 30, 2006) (“Public Notice”).

² 47 C.F.R. § 64.2001, *et seq.*

No Third Party Disclosure of CPNI

As stated above, Volo does not share, sell, lease and otherwise provide CPNI to third parties for the purposes of marketing any services. Sharing, selling, leasing or otherwise providing CPNI to any unrelated third parties is strictly prohibited by the Company and the Company has no plans to ever share this information with unrelated third parties. Volo does not use, disclose or provide access to CPNI to third parties that are not agents, independent contractors, or joint venture partners of Volo. Disclosure to agents, joint venture partners and independent contractors are made only after such entities or persons have executed a contract with Volo that includes provisions protecting the confidentiality of Volo's customer information. Specifically, the confidentiality provision prohibits contractors from disclosing or using, either during or after the term of their contract with Volo, any proprietary or confidential information of Volo's customers without Volo's prior written permission. The confidentiality provision further obligates the contractor to comply with all applicable laws and regulations. Breach of the confidentiality provision may result in termination of the contract at Volo's discretion.

No Use of CPNI For Marketing Non-Communications-Related Services

Volo does not use CPNI for marketing Non-Communications related services to its customers.

Review Process for Outbound Marketing Campaigns

All out bound marketing campaigns fall under the supervisory purview of Volo's marketing director. The Company does not currently engage in any large-scale coordinated sales and marketing campaigns. The Company does market new services to existing customers on a case-by-case basis.

Employment at Volo is Contingent on Protecting Customer Confidential Information

Maintaining the privacy of Customers' CPNI is a condition of employment at CPNI. Volo vigorously enforces violations of this duty and fortunately has not had to prosecute any former employees that have attempted to breach the privacy of customer CPNI after leaving Volo.

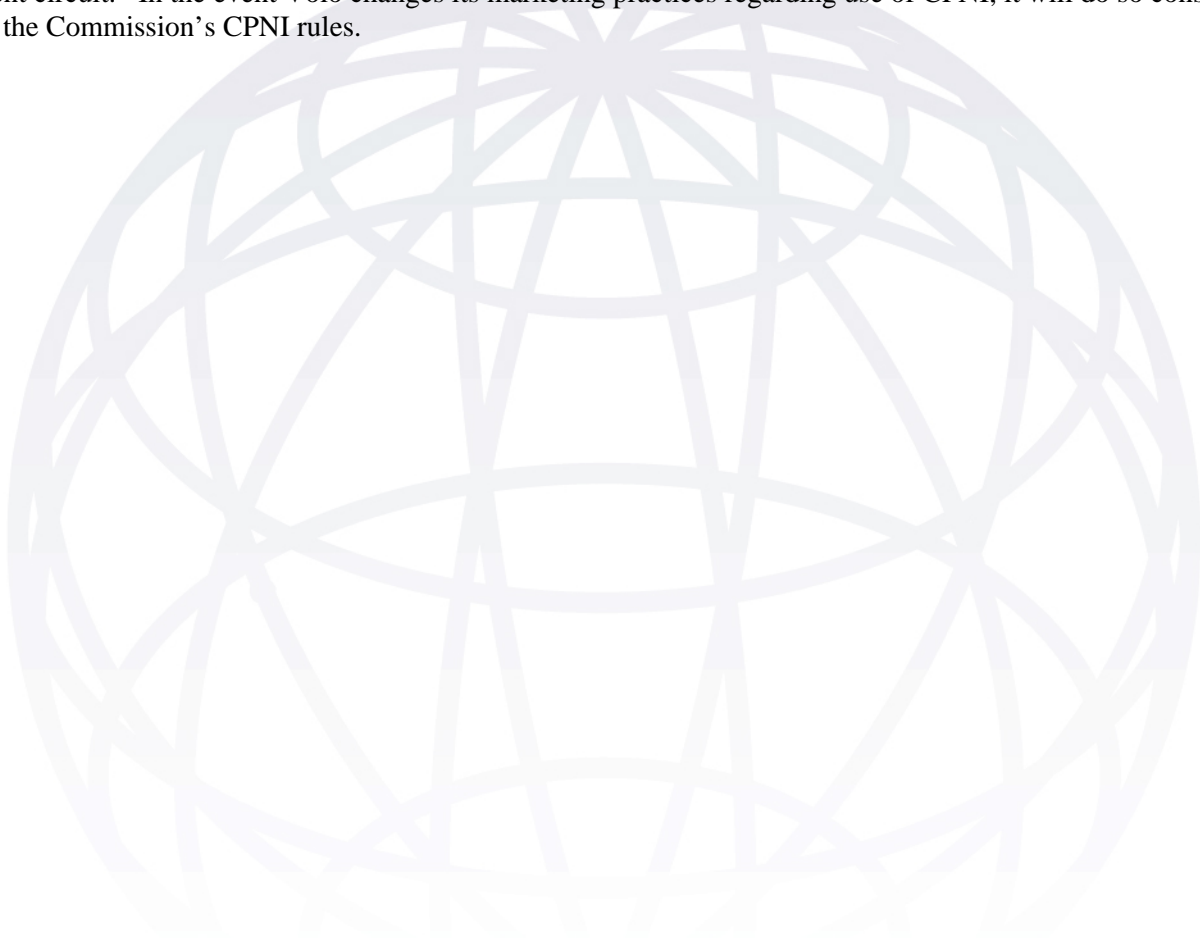
All Volo employees are required to execute a Proprietary Information Agreement ("PIA") in order to begin employment at Volo. This PIA, among other things, requires employees to hold customer confidential information in the strictest confidence. This policy bars employees from disclosing such confidential and proprietary information, and prohibits employees from removing confidential information upon conclusion of employment with Volo. Violation of this policy may result in, among other actions, suspension of work, duties, diminution of responsibilities or demotion, and termination of employment.

Although the Company has never received any complaint from a customer that it has misused CPNI in any fashion, in an abundance of caution and in light of the recent reports about dissemination of sensitive, personal subscriber information to third parties, the Company is currently auditing all of its training and discipline policies and procedures relating to the use of CPNI by Company employees.

Volo, will use CPNI (1) to bill and collect for services rendered; (2) to protect rights or property of the Company, other users or other carriers from unlawful use; (3) to provide any inbound telemarketing or

administrative services for the duration of a call; (4) for the purpose of providing customer premises equipment (“CPE”) and protocol conversion; and (5) in order to provision inside wiring, maintenance and repair services.

The Company only uses, discloses or permits access to CPNI for marketing purposes in the context of marketing the type of service offerings to which its existing customers already subscribe. For instance, the Company may use CPNI to market a higher capacity circuit to a carrier customer who is over utilizing their current circuit. In the event Volo changes its marketing practices regarding use of CPNI, it will do so consistent with the Commission’s CPNI rules.





VOLO COMMUNICATIONS, INC.

www.volocommunications.com

Volo Communications, Inc. □ 151 South Wymore Road □ Suite 3000 □ Altamonte Springs, FL 32714 □ 407-389-3232 □ volocommunications.com

Respectfully submitted,

Shawn Lewis

Chief Technology Officer
Volo Communications, Inc.

cc: Bryon McCoy
Best Copy and Printing

caerus networks

 caerus

caerus
billing @ mediation
www.caerus.com



Volo Communications, Inc. □ 151 South Wymore Road □ Suite 3000 □ Altamonte Springs, FL 32714 □ 407-389-3232 □ volocommunications.com

Certificate

I, Shawn Lewis, state that I am Chief Technology Officer of Volo Communications, Inc.; that I am authorized to submit the foregoing Certificate and Compliance Statement on behalf of Volo Communications, Inc.; and that it is true and correct to the best of my knowledge, information, and belief.

Name:

Shawn Lewis

Title:

Chief Technology Officer
Volo Communications, Inc.